

STATE OF CALIFORNIA  
Division of Labor Standards Enforcement  
Department of Industrial Relations  
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Attorneys for Defendant, AEROTEK, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JULIE SU, California State Labor  
Commissioner, Division of Labor  
Standards Enforcement, Department of  
Industrial Relations, State of California, on  
behalf of the People of the State of  
California,

Plaintiff,

v.

AEROTEK, INC., a Foreign Corporation;  
and DOES 1 to 10, Inclusive,

Defendants.

Case No. 3:15-cv-00428-JSW

**JOINT STIPULATION AND REQUEST TO  
CONTINUE STATUS CONFERENCE**

**AND ORDER THEREON AS MODIFIED**

Conference Date: May 20, 2015

Time: 11:00 a.m.

Ctrm: 5, 2<sup>nd</sup> Floor, Oakland

1 The parties to the above-entitled action jointly submit this JOINT STIPULATION AND  
 2 REQUEST TO CONTINUE THE STATUS CONFERENCE currently scheduled for May 20, 2016,  
 3 to June 10, 2016, for good cause as set forth below:

4 The parties reached agreement on a mediator's proposal at their March 3, 2016 mediation.  
 5 Counsel for Plaintiff has had difficulty communicating about finalizing the settlement agreement  
 6 with real party-in-interest Dr. Ragui Michael, whose interests Plaintiff represents in this case.  
 7 Plaintiff filed, and has control over, the action, which was brought on behalf of Dr. Michael.  
 8 However, it is necessary to have Dr. Michael as a party to the settlement agreement because he was  
 9 the alleged victim of unlawful retaliation.

10 The difficulty in communication between Plaintiff and Dr. Michael is in large part because  
 11 Dr. Michael has been abroad for the past seven weeks, and is still there. There have also been  
 12 disputes between Plaintiff and Dr. Michael about legal aspects of the settlement agreement not  
 13 specified in the mediator's proposal agreed to by the parties, in particular about the proper tax  
 14 treatment of the settlement amount. As of today, May 26, 2016, the parties appear to be close to  
 15 resolving the outstanding issues and are confident that the issues will be resolved and a dismissal can  
 16 be on file before June 10, 2016.

17 As a result, the parties hereby jointly stipulate and request that the Status Conference  
 18 currently scheduled for May 27 at 11:00 a.m. be continued for two weeks, until June 10, 2016, at  
 19 11:00 a.m.

20  
 21 Dated: May 20, 2016

/s/ Matthew A. Goodin  
 MATTHEW A. GOODIN  
 EPSTEIN BECKER & GREEN, P.C.  
 Attorneys for Defendant  
 AEROTEK, INC.

22  
 23  
 24 Dated: May 20, 2016

/s/ Michael Smith  
 MICHAEL L. SMITH  
 Division of Labor Standards Enforcement  
 Attorneys for Plaintiff

1 I, the filer of this document, attest that all other signatories listed, and on whose behalf the  
2 filing is submitted, concur in the filing's content and have authorized the filing.

3 Dated: May 20, 2016

/s/ Matthew A. Goodin  
MATTHEW A. GOODIN

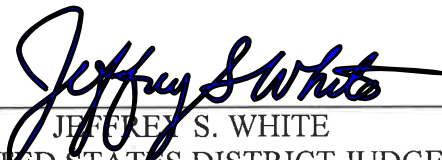
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7 ORDER CONTINUING STATUS CONFERENCE

8 The above JOINT STIPULATION AND REQUEST TO CONTINUE THE STATUS  
9 CONFERENCE is hereby GRANTED. The Status Conference currently scheduled for May 27 at  
10 11:00 a.m. is hereby VACATED. The parties shall appear in person through lead counsel for a  
11 Status Conference on June 10, 2016, at 11:00 a.m.

12 Further requests for continuance of the status conference shall be disfavored.

13 **IT IS SO ORDERED.**

14 Dated: May 26, 2016

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16 JEFFREY S. WHITE  
17 UNITED STATES DISTRICT JUDGE  
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